

UNITED STATES DISTRICT OF COURT
SOUTHERN DISTRICT OF NEW YORK

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2022 JUL 21 PM 2:59

Shane Richards (Pro Se)

(Case I.D. Number)

Plaintiff

-VS-

Warner Music Group, The Orchard Music, and
Blunt Recordings

Defendant

17 U.S. Code § 502

I, Shane Richards, of 100 Fisher Ave, PO Box 703, White Plains, New York, United States.

MAKE OATH UNDER THE PENALTY OF PERJURY:

Respectfully request for the court to grant relief of One Hundred and Fifty Thousand Dollars (\$150,000.00) and Four Hundred Dollars (\$400.00) filing fees under the copyright infringement statute. Shane Richards, is the sole owner of sound recording song titled "Nah Run Down Gal" aka Nah Run Nuh Gal, Performed by Oneil Bryant performing name Elephant Man and Patrick Ricardo Jackson performing name Harry Toddler of Scare Dem Crew.

This song was originally release in 1997 by Greensleeves Records on Behalf of record producer Shane Richards of Shines Production.

Warner Music Group, Orchard Music and Blunt Records have release song title "Nah Run Down Gal" aka "Nah Run Nuh Gal" without permission from the sound recording owner Shane Richards.

Defendants infringe US Copyright Certificate SR0000639029. Registration date 2008-07-25. **(EXHIBIT C and D)**

You tube Copyright Claim below, Warner Music Group, Orchard Music and Blunt Recording refused to remove the claim July 14, 2022, **(EXHIBIT B)** after they were contacted by the intellectual property owner Shane Richards on June 19, 2022, via You tube dispute **(EXHIBIT A)**.

SONG

Nah Run Down No Gal

ARTIST

Scare Dem Crew

ALBUM

Scared From the Crypt

LICENSES

Affidavit

Page 2 of 2

WMG, The Orchard Music (on behalf of Blunt Recordings/The Orchard); The Royalty Network (Publishing), and 1 Music Rights Societies

Signed _____ (Pro Se)

Shane Richards, Owner of Sound Recording

cc: Warner Music Group

1633 Broadway, New York, NY 10019

cc: The Orchard Music

23 E. 4th Street, Ste 3, New York, NY 10003

cc: Blunt Recordings

23 E. 4th Street, Fl 3, New York, NY 10003

STATE OF NEW YORK

COUNTY OF UNITED STATES

SUBSCRIBED AND SWORN TO BEFORE

ME, on the 19th day of

July, 2022

Signature

(Seal)

NOTARY PUBLIC

My Commission expires:

MARIE DYKAS
Notary Public, State of New York
No. 01DY6120125
Qualified in Suffolk County
Commission Expires Dec. 13, 2024

Shane Richards

(Signature)

Shane Richards

EXHIBIT C

SOUND RECORDING

Type of Work: Sound Recording

Registration Number / Date: SR0000639029 / 2008-07-25

Application Title: Ragga Ragga Ragga 10.

Title: Flava, et al.

Description: Compact disc.

Copyright Claimant: Marwan Music LLC, Transfer: by written agreement. Address: P.O Box 7880, Los Angeles, CA, 90007, United States.

Date of Creation: 1998

Date of Publication: 1998-03-02

Nation of First Publication: United Kingdom

Authorship on Application: Shane Richards; Domicile: Jamaica; Citizenship: Jamaica. Authorship: sound recording, performance.

Rights and Permissions: Marwan Music LLC, P.O Box 7880, Los Angeles, CA, 90007, United States

Copyright Note: C.O. correspondence.

Contents: Flava -- Superman -- Nah Run Nuh Gal -- Dolly House -- Cold Like Ice -
- Gal Sheet -- No One Style -- Big Things Ah Gwaan -- Tell A Gal Chill
-- Dem Ah Watch Mi -- Picture Frame -- Pelpa.

Names: Richards, Shane

Marwan Music LLC

Fwd: [Copyright claim] Your dispute has been submitted

From: **YouTube** <accounts-noreply@youtube.com>
Date: Sun, Jun 19, 2022 at 1:12 AM
Subject: [Copyright claim] Your dispute has been submitted
To: Shines Production <shines98records@gmail.com>



Hi Shines Production,

The following claim on video Nah Run Down Gal, Elephant Man Ft. Harry Toddler #elephantman #harrytoddler #nahrundowngal #1997 has been disputed:

- **Video title:** Nah Run Down Gal, Elephant Man Ft. Harry Toddler #elephantman #harrytoddler #nahrundowngal #1997
- **Copyrighted content:** Nah Run Down No Gal
- **Claimed by:** The Orchard Music and WMG

[View options](#)

Reason for dispute: Video is uploader's original content

- I have a good faith belief that the claim(s) described above have been made in error, and that I have the right(s) necessary to use the contents of my video for the reasons I have stated.
- I am sure that I own all rights to the audio and visual content in this video, and I want to dispute this claim.
- I understand that my video will be viewable by the claimant(s) so that they can review my dispute.
- I understand that filing fraudulent disputes may result in termination of my YouTube channel.

Authorized signature:

You are receiving this email as confirmation that we have received your dispute. The Orchard Music and WMG has up to 30 days to review the information you provided and take action.

If the copyright owners agree with your dispute, they can release the claim at any time. If they disagree, they can choose to uphold it, and the claim will remain active on your video. Learn more about [\[//support.google.com/youtube/answer/2797454?hl=en\]](https://support.google.com/youtube/answer/2797454?hl=en)disputes.

Sincerely,
The YouTube Team

EXHIBIT B



[Copyright claim] Your dispute has been reviewed: "Nah Run Down Gal, Elephant Man Ft. Harry Toddler #elephantman #harrytoddler #nahrundowngal #1997"

YouTube <accounts-noreply@youtube.com>
To: Shines Production <shines98records@gmail.com>

Thu, Jul 14, 2022 at 12:27 PM



Hi Shines Production,

After reviewing your dispute, The Orchard Music has decided that their copyright claim is still valid.

Video title: Nah Run Down Gal, Elephant Man Ft. Harry Toddler #elephantman #harrytoddler #nahrundowngal #1997
Copyrighted content: Nah Run Down No Gal
Claimed by: The Orchard Music

[View options](#)

Why this can happen

- The copyright owner might disagree with your dispute.
- The reason you gave for disputing the claim may have been insufficient or invalid.

- The YouTube Team

[Help center](#) • [Email options](#)

©2022 YouTube, LLC 901 Cherry Ave, San Bruno, CA 94066, USA

EXHIBIT D



Shines Production <shines98records@gmail.com>

**Copyright catalog Builder Search for
shanenbsprichardsnbspinnbspKeywordnbspAnywherenbs**

2 messages

Library of Congress Catalog <no-reply@loc.gov>

Fri, Jul 15, 2022 at 2:43 PM

To: shines98records@gmail.com

Type of Work: Sound Recording

Registration Number / Date:
SR0000639029 / 2008-07-25

Application Title: Ragga Ragga Ragga 10.

Title: Flava, et al.

Description: Compact disc.

Copyright Claimant:
Marwan Music LLC, Transfer: by written agreement.

Date of Creation: 1998

Date of Publication:
1998-03-02Nation of First Publication:
United KingdomAuthorship on Application:
Shane Richards; Domicile: Jamaica; Citizenship: Jamaica.
Authorship: sound recording, performance.Rights and Permissions:
Marwan Music LLC, P.O Box 7880, Los Angeles, CA, 90007,
United States

Copyright Note: C.O. correspondence.

Names: Richards, Shane
Marwan Music LLC

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The Library of Congress
United States Copyright Office
101 Independence Ave., S.E.
Washington, D.C. 20559-6000
202-707-3000

TABLE OF CONTENT

1. Copyright Infringement Complaint
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 5. US Copyright Catalog Search - (EXHIBIT C and D)
 6. PROOF OF ADDRESS SERVICE
 7. MONEY ORDER FEE FOR FILING \$350.00
 8. SHANE RICHARDS EMAIL CONTACT
SHINES 98 RECORDS @GMAIL.COM
-

PROOF OF ADDRESS SERVICE

Warner Music Group:
1633 Broadway, New York, NY 10019

PAYMENT:

7017 1450 0001 2359 4513

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

NEW YORK, NY 10019

OFFICIAL USE

Certified Mail Fee	\$4.00	0798
	\$3.25	09
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.84	
Total Postage and Fees	\$8.09	

Postmark Here

07/19/2022

Sent To: Warner Music Group
Street and Apt. No., or PO Box No. 1633 Broadway
City, State, ZIP+4® New York, NY 10019

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

The Orchard Music:
E. 4th Street, Ste 3, New York, NY 10003

7017 1450 0001 2359 4520

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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NEW YORK, NY 10003

OFFICIAL USE

Certified Mail Fee	\$4.00	0798
	\$3.25	09
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.84	
Total Postage and Fees	\$8.09	

Postmark Here

07/19/2022

Sent To: The Orchard Music
Street and Apt. No., or PO Box No. 23 E. 4th Street - # 3
City, State, ZIP+4® New York, NY 10003

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Blunt Recordings:
23 E. 4th Street, Fl 3, New York, NY 10003

7017 1450 0001 2359 4506

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New York, NY 10003

OFFICIAL USE

Certified Mail Fee	\$4.00	0798
	\$3.25	09
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.84	
Total Postage and Fees	\$8.09	

Postmark Here

07/19/2022

Sent To: BLUNT Recording
Street and Apt. No., or PO Box No. 23 E. 4th Street - Fl 3
City, State, ZIP+4® New York, NY 10003

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



WYANDANCH
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WYANDANCH, NY 11798-3230
(800)275-8777

07/19/2022 02:19 PM

Product	Qty	Unit Price	Price
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First-Class Mail® Letter	1		\$0.84
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New York, NY 10003
Weight: 0 lb 1.50 oz
Estimated Delivery Date
Thu 07/21/2022
Certified Mail®
Tracking #: 70171450000123594506 \$4.00

Return Receipt
Tracking #: 70171450000123594506 \$3.25

9590 9402 3679 7335 7802 11
Total \$8.09

First-Class Mail® Letter	1		\$0.84
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New York, NY 10019
Weight: 0 lb 1.50 oz
Estimated Delivery Date
Thu 07/21/2022
Certified Mail®
Tracking #: 70171450000123594513 \$4.00

Return Receipt
Tracking #: 70171450000123594513 \$3.25

9590 9402 3679 7335 7801 98
Total \$8.09

First-Class Mail® Letter	1		\$0.84
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New York, NY 10003
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Estimated Delivery Date
Thu 07/21/2022
Certified Mail®
Tracking #: 70171450000123594520 \$4.00

Return Receipt
Tracking #: 70171450000123594520 \$3.25

9590 9402 3679 7335 7802 28
Total \$8.09

Money Order \$350.00

Serial#: 28278656662
Money Order Fee \$1.65

Total \$351.65

Grand Total: \$375.92

Cash \$380.00
Change -\$4.08

Shane Richards
100 Fisher Avenue
White Plains, NY 10606



7017 1450 0001 2359 4537

Pro-se Intake clerk
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



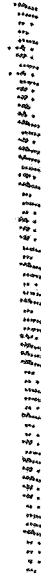
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U.S. POSTAGE PAID
FORM LETTER
WYANDANCH, NY
11798
JUL 19 22
AMOUNT
\$8.09
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2022 JUL 21 PM 2:52



100001415 0005